

REMARKS

Claims 1 and 3-12 are pending in the present application. Claims 2 and 13 have previously been cancelled without prejudice. Applicants have not amended the claims with this response and therefore have not provided a listing of the claims in accordance with 37 C.F.R. § 1.121(c).

Favorable reconsideration is respectfully requested.

I. Objections to the Specification

The specification has been objected to for incorporation by reference of the priority applications. Applicants respectfully assert that incorporation by reference of the priority applications is proper under 37 C.F.R. §1.57(a). Should it be necessary to rely upon any of the material incorporated by reference to overcome any objection or rejection, Applicants will amend the specification and submit a statement as required by 37 C.F.R. §1.57(f).

Therefore, Applicants respectfully request that the objection to the specification be withdrawn.

II. Claim Rejections under 35 U.S.C. §102

Claims 1 and 3-12 have been rejected under 35 U.S.C. §102(b) as being anticipated by Sutton (U.S. 3,283,780).

Applicants respectfully traverse the rejection of claims 1 and 3-12 as being anticipated by Sutton.

Applicants' claim 1 requires a first unit having a tubular male part and a second unit having a tubular female part. Claim 1 also requires that the first unit includes first sealing elements and the second unit includes second sealing elements, the first sealing elements and the second sealing elements are mutually lockingly engageable wherein the mutual engagement establishes a lock between the first and second sealing elements to keep the first unit and the second unit together.

Sutton is directed to a pipe coupling having two identical units 13 and 13a. (Col. 2, line 32.) One object of the invention is to provide a coupling having two identical units having complimentary interlocking means. (Col. 1, lines 14-16.) Another object of

the invention of Sutton is to provide mating edges on the coupling using with a series of annularly arranged complementary fingers and recesses, alternately disposed for interlocking engagement to prevent the rotary movement of one unit with respect to the other. (Col. 1, lines 25-29.) Sutton discloses gaskets 28 and 28a to contact the fingers of the units 13 and 13a, respectively, and abutting edges of the gaskets 28, 28a are forced into sealing contact with one another. (Col. 3, lines 34-39.) Sutton further discloses a separate locking device including two handles 31 and 31a lying in parallel along the periphery of the coupling as shown in FIG. 5, to cause the respective lock rods 38 and 38a to be pulled inwardly to draw the coupling units together in a locked position. Sutton is directed to providing two **identical** units and clearly fails to teach or suggest a first unit having a tubular **male** part and a second unit having a tubular **female** part. Sutton further fails to teach or suggest that first sealing elements and second sealing elements are mutually lockingly engageable wherein the mutual engagement establishes a lock between the first and second sealing elements to keep the first unit and the second unit together. Instead, Sutton teaches separate locking handles 31 and 31a that lock the identical units together. The gaskets 28 and 28a that form a seal between the two identical units contact each other, but in no way provide a lock to keep the first unit and the second unit together.

In contrast, Applicants' claim 1 requires a first unit having a tubular male part and a second unit having a tubular female part. In addition, claim 1 further requires first and second sealing elements configured for being mutually lockingly engagable wherein the mutual engagement establishes a lock between the first and second sealing elements to keep the first unit and the second unit together. Clearly, Sutton fails to teach each and every claimed element of claim 1 as required by 35 U.S.C. § 102.

Applicants respectfully request that the rejection of claims 1 and 3-12 under 35 U.S.C. § 102 (b) be withdrawn.

III. Summary

It is respectfully asserted that the claims properly define the invention and that the invention is both novel and non-obvious. Allowance of the present claims is earnestly solicited.

Should the Examiner wish to discuss any of the above submissions in more detail, the Examiner is asked to please call the undersigned at the telephone number listed below.

Respectfully submitted,

A handwritten signature in black ink, reading "Heidi A. Dare", is written over a horizontal line.

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